

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KAREN BARRETT,

Plaintiff,

-against-

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,

Defendant.
-----X

Civ. Act. No.: 10 CV 4600 (AKH)

**DECLARATION OF
DEANIE WALLIS**

DOCUMENT
ELECTRONICALLY FILED

DEANIE WALLIS, pursuant to 28 U.S.C. §1746(2) declares under penalty of perjury the following:

1. I am currently employed as an Appeal Specialist in the Appeals Unit for Hartford Life Insurance Company ("Hartford"). I was personally involved in the review of Karen Barrett's long-term disability ("LTD") claim on administrative appeal, which included review of the applicable plan documents and the administrative record.
2. This Declaration is respectfully submitted in support of Hartford's motion for summary judgment.
3. Annexed hereto as **Exhibit "A"** is a true and correct copy of the group insurance policy no. GRH/GLT/GL-675462 issued by Hartford to Greystone & Co., Inc. & Affiliates insuring the Group Long Term Disability, Life and Supplemental Life Plan for employees of Greystone & Co., Inc. & Affiliates effective August 1, 2005, numbered BARRETT 000001 to BARRETT 000066.
4. Annexed hereto as **Exhibit "B"** is a true and correct copy of Hartford's claim file, numbered BARRETT 000067 to BARRETT 000518. The claim file constitutes the administrative

record kept and maintained by Hartford in the normal and ordinary course of its business in connection with Barrett's claim for LTD benefits under the Plan.

5. The decision to deny plaintiff Barrett's claim for LTD benefits was not motivated by self-interest or by a desire to avoid paying benefits. Rather, the decision was based entirely on the governing terms and provisions of the LTD Plan and the information contained in the administrative record pertaining to Barrett's claim for benefits.

6. In reaching my decision on appeal as set forth in my letter dated March 12, 2010 (BARRETT 00134-138), I considered all documents and information submitted by or on Barrett's behalf in support of her claim or otherwise obtained by Hartford during both the initial claim review and upon her administrative appeal.

7. During my review of Barrett's denied claim on administrative appeal, I did not discuss the claim with the original Ability Analyst, Angela McDuffie, who made the initial benefits determination, or his supervisors.

8. During my review of Barrett's denied claim on administrative appeal, I did not consider the financial impact of denying or approving her claim, or discuss that issue with anyone who works in Hartford's financial or underwriting departments.

9. As a member of the Appeals Unit at Hartford, I did not receive any remuneration, bonus, award, recognition or other incentives to deny LTD claims. My performance evaluations were based on the accuracy of my decision-making regardless of whether my decision resulted in an award or denial of benefits on the claims I reviewed.

I declare under penalty of perjury that the foregoing
is true and correct.

Dated: 3/22/11



DEANIE WALLIS

CERTIFICATE OF SERVICE

I, DANIEL M. MEIER, hereby certify and affirm that a true and correct copy of the attached **DECLARATION OF DEANIE WALLIS** was served **via ECF** and **via regular mail** on this 29th day of March, 2011, upon the following:

Scott M. Riemer Esq.
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s/_____
DANIEL M. MEIER (DM 2833)

Dated: New York, New York
March 29, 2011